NOTICE OF PRESENTMENT OF CONSENT ORDER LIFTING THE AUTOMATIC STAY AND ALLOWING MMS TO TAKE POSSESSION OF STORAGE UNIT AND SELL OR DISPOSE OF CONTENTS AND OPPORTUNITY FOR HEARING

PLEASE TAKE NOTICE that upon the annexed Consent Order of Manhattan Mini Storage LLC, the undersigned will present the attached proposed order to the Honorable Sean H. Lane, United States Bankruptcy Judge, for signature on May 4, 2016 at 12:00 noon.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: New York, New York April 26, 2016

PERKINS COIE LLP

/s/ Jeffrey D. Vanacore

By: Jeffrey D. Vanacore, Esq.

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